Case 3:14-cv-00173-SI Document 199 Filed 10/20/16 Page 1 of 3

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18	UNITED STATES DISTRICT COURT		
19	NORTHERN DISTRICT OF CALIFORNIA		
20	SAN FRANCISCO DIVISION		
21	NATTO IYELA GBARABE,	Case No. 14-cv-00173-SI	
22	Plaintiff,	STIPULATION AND [PROPOSED] ORDER RE: CHEVRON'S RESPONSE	
23	V.	TO PLAINTIFF'S AMENDED CLASS DEFINITION	
24	CHEVRON CORPORATION,		
25	Defendant.		
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I.		G : 1 : D G : . D	

Stipulation Re: Chevron's Resp. to Plf's Am. Class Definition Case No. 14-CV-00173-SI

Case 3:14-cv-00173-SI Document 199 Filed 10/20/16 Page 2 of 3

1	Pursuant to Local Rules 6-2 and 7-12, plaintiff Natto Iyela Gbarabe and defendant		
2	Chevron Corporation enter the following stipulation:		
3	Whereas, the Court held a Case Management Conference on September 30, 2016;		
4	Whereas, the Court entered a Minute Entry concerning the Case Management Conference		
5	on October 3, 2016 (ECF 192);		
6	Whereas, the "Summary" in the Minute Entry states that "Plaintiff shall produce the		
7	following items by 10/7/16: 1) privilege logs, 2) amend[ed] class definition, 3) supplemental		
8	responses to interrogatories re: 'verbal opinion as expressed by Verde.' Defendant may file its		
9	response to the supplemental interrogatory responses by 10/21/16";		
10	Whereas, consistent with the discussion at the CMC, the parties believe that the final		
11	sentence should state, "Defendant may file its response to the amended class definition by		
12	10/21/16"; and		
13	Whereas, the parties have met and conferred regarding this issue.		
14	Subject to the Court's approval, the parties stipulate to the following:		
15	1. The final sentence of the Minute Entry Summary is amended to state: "Defendant		
16	may file its response to the amended class definition by 10/21/16."		
17		IONES DAV	
18	Dated: October 19, 2016	JONES DAY	
19		By: /s/ Robert A. Mittelstaedt Robert A. Mittelstaedt	
20		Counsel for Defendant	
21		CHEVRON CORPORATION	
22	Dated: October 19, 2016	PERRY & FRASER	
23	Dated. October 17, 2010		
24		By: <u>/s/ Neil Fraser</u> Neil Fraser	
25		Counsel for Plaintiff	
26		NATTO IYELA GBARABE	
27			
28		Stipulation Re: Chevron's Resp.	
		to Diffe Am Class Definition	

Stipulation Re: Chevron's Resp. to Plf's Am. Class Definition Case No. 14-CV-00173-SI

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2	SIGNATURE ATTESTATION		
3	I hereby attest that concurrence in the filing of this document has been obtained from all		
4	persons whose signatures are indicated by a "conformed" signature (/s/) within this e-filed		
5	document.		
6	Dated: October 19, 2016	JONES DAY	
7		By: /s/ Robert A. Mittelstaedt	
8		Robert A. Mittelstaedt	
9		Counsel for Defendant CHEVRON CORPORATION	
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18	[PROPOSED] ORDER		
19	PURSUANT TO STIPULATION, IT IS SO OR	DERED.	
20			
21	Dated:	Juran Delaton	
22	Dated.	The Honorable Susan Illston	
23	NAI-1502184099v1		
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27			
28		Stipulation Re: Chevron's Resp	
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Stipulation Re: Chevron's Resp. to Plf's Am. Class Definition Case No. 14-CV-00173-SI